

ANGELINA CAMARILLO, et al

v

CITY OF NORTH LAS VEGAS, et al

DEFENDANTS' PETITION FOR REMOVAL  
UNDER 28 U.S.C. § 1446(a)

EXHIBIT A

Complaint

Pages 1-21

## DISTRICT COURT CIVIL COVER SHEET

Clark

County, Nevada

Case No. \_\_\_\_\_

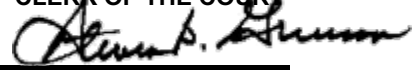
(Assigned by Clerk's Office)

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Steven D. Grierson

CLERK OF THE COURT

**I. Party Information** (provide both home and mailing addresses if different)

Plaintiff(s) (name/address/phone):

Angelina Camarillo, Estate of Felicia Guzman

C/o Peter Goldstein

Defendant(s) (name/address/phone):

CITY OF NORTH LAS VEGAS;

BECKY SALKO CASE NO. A-25-919142-C

2250 Las Vegas Blvd. North Department 10

North Las Vegas, Nevada 89030

Attorney (name/address/phone):

Peter Goldstein, Attorney at law

10161 Park Run Drive Suite 150, Las Vegas, NV 89145

(702) 474-6400

Attorney (name/address/phone):

**II. Nature of Controversy** (please select the one most applicable filing type below)**Civil Case Filing Types**

Real Property	Negligence	Torts
<b>Landlord/Tenant</b> <input type="checkbox"/> Unlawful Detainer <input type="checkbox"/> Other Landlord/Tenant <b>Title to Property</b> <input type="checkbox"/> Judicial Foreclosure <input type="checkbox"/> Other Title to Property <b>Other Real Property</b> <input type="checkbox"/> Condemnation/Eminent Domain <input type="checkbox"/> Other Real Property	<input type="checkbox"/> Auto <input type="checkbox"/> Premises Liability <input type="checkbox"/> Other Negligence <b>Malpractice</b> <input type="checkbox"/> Medical/Dental <input type="checkbox"/> Legal <input type="checkbox"/> Accounting <input type="checkbox"/> Other Malpractice	<b>Other Torts</b> <input type="checkbox"/> Product Liability <input checked="" type="checkbox"/> Intentional Misconduct <input type="checkbox"/> Employment Tort <input type="checkbox"/> Insurance Tort <input type="checkbox"/> Other Tort
Probate	Construction Defect & Contract	Judicial Review/Appeal
<b>Probate</b> (select case type and estate value) <input type="checkbox"/> Summary Administration <input type="checkbox"/> General Administration <input type="checkbox"/> Special Administration <input type="checkbox"/> Set Aside <input type="checkbox"/> Trust/Conservatorship <input type="checkbox"/> Other Probate <b>Estate Value</b> <input type="checkbox"/> Over \$200,000 <input type="checkbox"/> Between \$100,000 and \$200,000 <input type="checkbox"/> Under \$100,000 or Unknown <input type="checkbox"/> Under \$2,500	<b>Construction Defect</b> <input type="checkbox"/> Chapter 40 <input type="checkbox"/> Other Construction Defect <b>Contract Case</b> <input type="checkbox"/> Uniform Commercial Code <input type="checkbox"/> Building and Construction <input type="checkbox"/> Insurance Carrier <input type="checkbox"/> Commercial Instrument <input type="checkbox"/> Collection of Accounts <input type="checkbox"/> Employment Contract <input type="checkbox"/> Other Contract	<b>Judicial Review</b> <input type="checkbox"/> Foreclosure Mediation Case <input type="checkbox"/> Petition to Seal Records <input type="checkbox"/> Mental Competency <b>Nevada State Agency Appeal</b> <input type="checkbox"/> Department of Motor Vehicle <input type="checkbox"/> Worker's Compensation <input type="checkbox"/> Other Nevada State Agency <b>Appeal Other</b> <input type="checkbox"/> Appeal from Lower Court <input type="checkbox"/> Other Judicial Review/Appeal
Civil Writ	Other Civil Filing	
<b>Civil Writ</b> <input type="checkbox"/> Writ of Habeas Corpus <input type="checkbox"/> Writ of Mandamus <input type="checkbox"/> Writ of Quo Warrant <input type="checkbox"/> Writ of Prohibition <input type="checkbox"/> Other Civil Writ	<b>Other Civil Filing</b> <input type="checkbox"/> Compromise of Minor's Claim <input type="checkbox"/> Foreign Judgment <input type="checkbox"/> Other Civil Matters	

Business Court filings should be filed using the Business Court civil coversheet.

May 15, 2025

Date

Signature of initiating party or representative

See other side for family-related case filings.

PETER GOLDSTEIN, ESQ.  
Nevada Bar No. 6992  
**PETER GOLDSTEIN LAW CORP**  
10161 Park Run Drive, Suite 150  
Las Vegas, Nevada 89145  
Telephone: (702) 474-6400  
Facsimile: (888) 400-8799  
peter@petergoldsteinlaw.com

*Attorney for Plaintiffs*  
*ANGELINA CAMARILLO, Individually*  
*and as Co-Special Administrator with ROLLY*  
*ENRIQUEZ of estate of FELICIA GUZMAN*

**DISTRICT COURT**  
**CLARK COUNTY, NEVADA**

ANGELINA CAMARILLO, individually and  
as Co-Special Administrator with Rolly  
ENRIQUEZ of the Estate of Decedent,  
FELICIA GUZMAN

Plaintiffs,

vs.

CITY OF NORTH LAS VEGAS; BECKY  
SALKOFF; CAITLYN EBERT; and DOES 1-  
20, inclusive,

Defendants.

CASE NO.:  
DEPT. NO.:

**PLAINTIFFS' COMPLAINT AND  
DEMAND FOR JURY TRIAL**

**Exhibit "A" Order Appointing Special  
Administrators**

**Exhibit "B" Redacted Death Certificate**

- 1. Unreasonable Search and Seizure—  
Excessive Force in violation of Article 1,  
§ 8 (2) & Article 18 of the Nevada  
Constitution**
- 2. Battery (Wrongful Death)**
- 3. Negligence (Wrongful Death)**
- 4. Americans with Disability Act Violation**

Plaintiffs, ANGELINA CAMARILLO, individually, and ROLLY ENRIQUEZ, as Co-Special Administrators of the ESTATE OF FELICIA GUZMAN, by and through their attorneys of record, PETER GOLDSTEIN, ESQ. of PETER GOLDSTEIN LAW CORP, hereby complain and allege against Defendants, and each of them, as follows:

**I.**

**PARTIES AND JURISDICTION**

1. At all relevant times, Decedent FELICIA GUZMAN ("DECEDENT" or "GUZMAN") was an individual residing in North Las Vegas, Nevada.

1           2.       DECEDENT is survived by her biological daughter, Plaintiff ANGELINA  
2 CAMARILLO (“CAMARILLO”).

3           3.       DECEDENT is also survived by her biological mother, Linda Guzman, who resides  
4 in Sacramento, California.

5           4.       At all times herein relevant, CAMARILLO resided in California.

6           5.       CAMARILLO sues in her individual capacity as daughter of DECEDENT and in a  
7 representative capacity as Co-Special Administrator of the Estate of Felicia Guzman. See Exhibit  
8 “B”, Order Appointing Co-Special Administrators of FELICIA GUZMAN, attached hereto, and  
9 incorporated herein by this reference. Plaintiffs seek all damages available under NRS 41.100.  
10

11          6.       At all times herein relevant, ROLLY ENRIQUEZ (“ENRIQUEZ”) resides in Clark  
12 County, Nevada.

13          7.       ENRIQUEZ sues in a representative capacity as co-special administrator of  
14 DECEDENT’s Estate.

15          8.       Plaintiff CAMARILLO seek both survival and wrongful death damages under  
16 Nevada state law while Plaintiff ENRIQUEZ is a co-administrator joining CAMARILLO for  
17 survival damages under Nevada state law.  
18

19          9.       At all times herein mentioned, Defendant CITY OF NORTH LAS VEGAS  
20 (hereinafter “CNLV”) is and was at all relevant times mentioned herein, a municipality duly  
21 organized and existing under the laws of the State of Nevada. It is a local government unit  
22 responsible for the area within its designated boundaries and employs, controls and supervises North  
23 Las Vegas Police Department (“NLVPD”).  
24

25          10.       At all relevant times, NLVPD was the employer of Defendants BECKY SALKOFF  
26 (“SALKOFF”), CAITLYN EBERT (“EBERT”) and DOES 1-10, (“DOE OFFICERS”) who were  
27 NLVPD Police Officers, and DOES 11 through 20 (“DOE SUPERVISORS”) who were managerial,  
28 supervisorial, and policymaking employees of the NLVPD.

1           11. SALKOFF, EBERT and DOE OFFICERS are sued in their individual capacity for  
2 damages only.

3           12. At all times herein mentioned, CNLV employed, controlled, and operated the  
4 NLVPD, its police officers, and are liable for the actions and/or inactions of its police officers and  
5 DOES 11-20

6           13. At all relevant times, Defendants SALKOFF, EBERT and DOES 1-10 were duly  
7 authorized employees and agents of NLVPD, who were acting under color of law within the course  
8 and scope of their respective duties as police officers and with the complete authority and ratification  
9 of their principal, Defendant CNLV.

10           14. At all relevant times, Defendants SALKOFF, EBERT and DOES 1-20 were duly  
11 appointed officers and/or employees or agents of NLVPD, subject to oversight and supervision by  
12 NLVPD's elected and non-elected officials.

13           15. In doing the acts and failing and omitting to act as hereinafter described Defendants  
14 SALKOFF and EBERT and DOES 1-20 were acting with the implied and actual permission and  
15 consent of CNLV.

16           16. At all times mentioned herein, every CNLV defendant was the agent of each and  
17 every other CNLV defendant and had the legal duty to oversee and supervise the hiring, conduct,  
18 and employment of each and every CNLV Defendant.

19           17. The true names of Defendants DOES 1 through 20, inclusive, are unknown to  
20 Plaintiffs, who therefore sue these defendants by such fictitious names.

21           18. DOES 1 and 2 are designated by fictitious names as they were present at the scene yet  
22 failed to do anything and were therefore integral participants and also failed to intervene.

23           19. The Plaintiffs will seek leave to amend this complaint to show the true names and  
24 capacities of these defendants when they have been ascertained.



1 prior to their contact with Neil. Plaintiffs allege that SALKOFF and EBERT were aware of the  
2 allegations against Guzman and had been briefed by those witnesses about the violence that she  
3 allegedly committed.

4 29. SALKOFF and EBERT lackadaisically spoke to Neil and interviewed him in front of  
5 the house where GUZMAN could see them, even though SALKOFF and EBERT had the  
6 information that GUZMAN was inside and armed with a knife. SALKOFF and EBERT did not  
7 direct Neil to move away from the house near a patrol car to keep him safe from GUZMAN, who  
8 they were informed had previously attacked a resident with a kitchen knife.

9 30. SALKOFF and EBERT showed absolutely no regard for the safety of the Neil or the  
10 use proper police tactics from the beginning of their arrival to their fatal shooting of GUZMAN.

11 31. SALKOFF and EBERT were aware of the dispatch call involving a serious event  
12 involving a person that was violent with a weapon. They failed to immediately address and utilize  
13 tactics to keep the public safe from danger. SALKOFF and EBERT failed to relocate Neil away  
14 from the house to interview him to prevent him from being caught in crossfire (which he was) or to  
15 facilitate their apprehending Guzman. Properly trained police officers would not have interviewed a  
16 witness in front of a residence in which they were aware that there was a person who allegedly  
17 committed a violent crime with a weapon and was still inside the house; SALKOFF and EBERT did  
18 not exhibit any concern of the gravity of the situation, nor did they communicate with each other and  
19 devise a tactical plan.

20 32. Eventually, a clearly agitated GUZMAN came out of the house with a knife in hand,  
21 after seeing the officers and Neil talking in front of the house. GUZMAN was clearly mentally  
22 distressed and not in a rational mindset.

23 33. SALKOFF and EBERT responded to GUZMAN by asking her to sit down in a chair  
24 and to put down the knife while simultaneously drawing their weapons, without regard for the  
25 people around or for less lethal force options.

26 34. GUZMAN was obviously having a mental crisis, as she was diagnosed with multiple  
27 mental health disorders and was unable to hear and/or comprehend commands based on the limited  
28 bodycam publicly available.

1           35.     SALKOFF and EBERT repeatedly yelled at GUZMAN with their weapons drawn,  
2 while DECEDENT was obviously in crisis, paranoid, and clearly non-compliant.

3           36.     Upon information and belief, GUZMAN walked towards SALKOFF and EBERT,  
4 who were able to back up and use patrol cars as cover. These officers had time, cover, and distance  
5 from GUZMAN before they improperly fired out of sheer desperation, as the result of their having  
6 no tactics, no planning, and no communication.

7           37.     SALKOFF and EBERT failed to articulate any form of warning that they would shoot  
8 their weapons if GUZMAN did not comply with their orders. Instead, they just shot GUZMAN  
9 multiple times.

10          38.     SALKOFF and EBERT shot GUZMAN with six (6) lethal rounds, and she was struck  
11 by four (4). The shots were fatal, killing GUZMAN.

12          39.     SALKOFF's and EBERT's use of lethal force - which killed GUZMAN - was  
13 unnecessary, unreasonable, and unlawful.

14          40.     Upon information and belief, SALKOFF and EBERT knew or should have known  
15 that GUZMAN was armed with a knife, so it was improper and deficient that SALKOFF and  
16 EBERT were surprised or taken aback when they saw GUZMAN with a knife in hand.

17          41.     Upon information and belief, SALKOFF and EBERT knew or should have known  
18 that GUZMAN had mental health issues by virtue of the previous legal 2000s, by the dispatch and  
19 by Neil and other witnesses.

20          42.     SALKOFF and EBERT did not preplan their approach even after they received  
21 information that GUZMAN had a knife and allegedly injured someone.

22          43.     SALKOFF and EBERT made no effort to peacefully resolve GUZMAN's mental  
23 health crisis by first establishing a rapport with her leading to them repeatedly screaming at her.

24          44.     SALKOFF and EBERT did not attempt to de-escalate the situation even if it was  
25 apparent that GUZMAN was having a mental crisis.

26          45.     SALKOFF and EBERT did not attempt to deploy any less lethal options despite  
27 having the means to do so. They were equipped with many tools in their duty belts and in their  
28



1 vehicles that they could have utilized, such as tasers and less lethal shotguns. Also, they could have  
2 called for back-up or a K9 unit to be deployed.

3 46. Upon information and belief, SALKOFF and EBERT did not attempt to request a  
4 Crisis Intervention Team.

5 47. SALKOFF and EBERT knew or should have known that GUZMAN could not hear,  
6 comprehend or comply their commands and was not responsive, because among other things, she  
7 was suffering from a mental health crisis.

8 48. Prior to and upon their arrival, before making contact with GUZMAN, SALKOFF  
9 and EBERT did not preplan or communicate a tactical plan on how to approach GUZMAN, they did  
10 not discuss the use of less lethal options or provide sufficient time to coordinate de-escalation, as  
11 well as failing to establish a rapport with her (these are basic police tactics that they seemed  
12 oblivious about).

13 49. SALKOFF and EBERT failed to establish or develop rapport with GUZMAN in order  
14 to try to de-escalate the situation. Instead, they completely ignored her while she was in the house by  
15 talking casually and lackadaisically with Neil in the front yard where GUZMAN could see them.

16 50. As GUZMAN exited the house right before she was shot, GUZMAN did not pose a  
17 threat to any member of the public. GUZMAN was not in a position where she was approaching  
18 another residence or other persons who might be potentially exposed to danger. There was no risk  
19 that GUZMAN was a threat to anyone other than potentially SALKOFF and EBERT whose  
20 approach was not within policy.

21 51. SALKOFF and EBERT should never have positioned themselves within striking  
22 distance of the subject coming out of the house armed with a knife. They failed to create and  
23 maintain sufficient distance. SALKOFF was specifically positioned next to the garage door which  
24 was especially concerning given that if she fired then Neil could have been struck by crossfire.

25 52. Upon information and belief, SALKOFF and EBERT did not attempt to gather  
26 additional resources, or use less lethal weapons, such as a 40-mm ballistic foam launcher, less lethal  
27 shotguns, tasers, K-9 team, crisis negotiators, or other tools.

1           53. This is especially concerning because NLVPD has had numerous instances of  
2 shooting persons in crisis who are holding sharp edged objects and failing to develop tactical plans  
3 to assess and attempt to diffuse the situations without the use of lethal force.

4           54. GUZMAN proceeded to walk toward the SALKOFF and EBERT in apparent  
5 distress and clearly unable to hear, comprehend or comply with their commands.

6           55. Upon information and belief, SALKOFF and EBERT shot and killed GUZMAN  
7 because of their deficient acts and omissions, including (without limitation) that they failed to  
8 employ proper police tactics, and they failed to plan their course of action in light of the possibility  
9 that GUZMAN may come out of the home with the weapon that they knew she was armed with.

10          56. At the time of the shooting, SALKOFF was forty years old and was working as a  
11 sergeant for NLVPD.

12          57. At the time of the shooting, EBERT was twenty-nine years old and was working as an  
13 officer for NLVPD.

14          58. For all the reasons mentioned above and all the failures to follow policy, SALKOFF  
15 and EBERT violated Article 1, § 18 of the Nevada Constitution guaranteeing the right to be free  
16 from unreasonable searches and seizures, which mirror the protections of the Fourth Amendment of  
17 the U.S. Constitution.

18          59. Upon information and belief, SALKOFF and EBERT failed to immediately render  
19 medical assistance, even though they are equipped with tourniquets, they failed to use them to stop  
20 the bleeding.

21          60. GUZMAN sustained multiple gunshot wounds which were the cause of her death as  
22 evidenced in her death certificate. Some of her gunshot wounds were to the back of her body which  
23 was fired after she was already disabled and in a defensive posture. Her death was ruled a homicide.

24          61. SALKOFF and EBERT's approach, implementation of preplanning (or lack thereof),  
25 failure to de-escalate, preclusion and deficient threat assessment were not within Departmental  
26 training, tactics, and policy. Among other things, SALKOFF and EBERT failed to communicate and  
27 coordinate a response, slow the momentum, and gather resources.

1           62. SALKOFF and EBERT were aware of and yet failed to abide by fundamental  
2 principles of officer-citizen contacts – including de-escalation, slowing the momentum, utilizing  
3 cover, and making use of the availability of other officers and resources. This is especially  
4 improper, given that there were at least one or two other NLVPD officers present who failed to do  
5 anything (DOES 1 and 2).

6           63. SALKOFF and EBERT's lack of adequate preplanning was not in accordance with  
7 tactics, training and policy. SALKOFF's and EBERT's supposed preplanning was that they would  
8 find the subject and expect the subject to comply with their commands. Defendants did not  
9 coordinate a response in the event that GUZMAN did not comply. They did not follow their training  
10 by planning or gathering the use of less lethal options we were both equipped with tasers.

11           64. SALKOFF and EBERT arrived at around 5:12PM at the residence and the fatal  
12 shooting occurred at 5:23 PM. They were there approximately 11 minutes during which they never  
13 communicated, developed a tactical plan, or established a rapport with GUZMAN.

14           65. SALKOFF and EBERT failed to move Neil into safety, when they were aware that  
15 GUZMAN was inside the house with a knife and was mentally unstable. SALKOFF and EBERT  
16 risked the life of Neil by allowing him to stay in close proximity with GUZMAN who had a knife.  
17 By unnecessarily chatting with Neil in front of the house where GUZMAN could see them,  
18 SALKOFF and EBERT likely caused GUZMAN to become more aggravated and agitated.

19           66. There was no urgency because GUZMAN was alone in the house and she was not at  
20 risk of hurting anyone inside; i.e., there was no need for SALKOFF and EBERT to rush to take  
21 immediate action without proper preplanning, communication, and deliberation. SALKOFF and  
22 EBERT knew that GUZMAN was in possession of a knife and that she had mental health issues; yet  
23 SALKOFF and EBERT failed to slow the momentum or de-escalate the situation. Instead, they  
24 aggravated it by poor planning, reckless disregard for the welfare of GUZMAN and Neil. They also  
25 failed to use DOES 1 and 2, who failed on their own.

26           67. Use of Force training provides for the use of cover, creation of time, creation of  
27 distance, to tactically reposition when necessary (among other things) in order to diffuse a tense  
28 police encounter. Instead, SALKOFF and EBERT drew their guns and shot at GUZMAN.

1 SALKOFF and EBERT failed to take action to de-escalate the situation or slow the momentum –  
2 other than twice shouting "drop the knife" just before firing. (Shouting “drop the knife” does not  
3 constitute a warning as to what would occur if GUZMAN did not drop the knife.) Meanwhile DOES  
4 1 and 2 did nothing.

5 68. Under Use of Force policies, the elements necessary to justify the use of deadly force  
6 include ability, opportunity, imminent jeopardy, and preclusion. Two core POST guidelines,  
7 regarding use of force principles, are de-escalation and slowing the momentum. SALKOFF and  
8 EBERT did not employ reasonable steps to de-escalate or slow the momentum. When they arrived at  
9 the scene, they were unorganized and used a hazardous approach to a high-risk encounter.

10 69. In addition to SALKOFF and EBERT, the two other officers present during the  
11 incident, now designated as DOES 1 and 2 failed to participate in any way.

12 70. The improper acts and omissions of SALKOFF and EBERT's resulted in imminent  
13 jeopardy and a lack of preclusion. SALKOFF and EBERT made serious errors that forced the  
14 situation. SALKOFF and EBERT violated the Use of Force policies and did not follow their  
15 training. Therefore, SALKOFF and EBERT's actions did not comply with departmental policies,  
16 procedures, and training. SALKOFF and EBERT's conduct involved multiple serious deviations –  
17 not mere technical deviations – from policy, tactics, and training leading to the death of Guzman.

18 71. As a result of the foregoing, GUZMAN suffered intense physical and emotional pain,  
19 anguish, distress and despair, and pre-death pain and suffering, including the loss of enjoyment of  
20 life and loss of familial relations.

21 72. SALKOFF and EBERT and DOES 1-10, are responsible for the GUZMAN's injuries  
22 and death either because they were personally involved or because they were integral participants or  
23 because they failed to intervene.

### 24 III.

#### 25 FIRST CLAIM FOR RELIEF

#### 26 EXCESSIVE FORCE - (Nev. Cons. art. 1, § 18)

#### 27 (SPECIAL ADMINISTRATORS v. SALKOFF and EBERT, DOES 1 and 2)

1           73.     Plaintiffs repeat, reallege, and incorporates herein by this reference, each and every  
2 allegation above as though fully set forth herein.

3           74.     Article 1, section 18 of the Nevada Constitutions requires the degree of force used by  
4 an officer to be objectively reasonable under the circumstances. Whether an officer's particular use  
5 of force was reasonable is judged from the perspective of a reasonable officer at the scene.

6           75.     To determine the perspective of a reasonable officer at the scene, a factfinder must  
7 consider the totality of the circumstances, including, but not limited to, the nature of the crime or  
8 other circumstances known to the officer, whether the plaintiff posed an immediate threat to the  
9 officer or others, the relationship between the need to use force and the amount or degree of force  
10 used, whether the officer made efforts to limit the amount of force used, and the availability of  
11 alternative methods that police officers can utilize to accomplish legitimate law enforcement  
12 objectives.

13           76.     SALKOFF and EBERT shot at GUZMAN six (6) times and striking her with four (4)  
14 bullets causing her death.

15           77.     Despite knowledge of her possession of a knife, SALKOFF and EBERT failed to  
16 preplan their course of action on how to deal with GUZMAN considering the circumstances.

17           78.     SALKOFF and EBERT were clearly caught off guard when GUZMAN exited the  
18 house. This is particularly troubling in light of the fact that they knew she had a knife, they knew she  
19 had allegedly injured someone and that she was alone in the house. That is the result of the lack of  
20 planning and communication which resulted in them being backed into a corner.

21           79.     SALKOFF did not even remotely consider the possibility that GUZMAN might come  
22 out with the knife, by how she positioned herself in the situation. She was in a position in which if  
23 she had to fire her weapon, Neil would be in the line of fire.

24           80.     SALKOFF and EBERT immediately drew their weapons at the sight of GUZMAN  
25 with a knife in her hand and repeatedly screamed at her despite the fact that she was obviously in  
26 crisis, paranoid, and unable to hear, comprehend or comply with commands.



89. As a result of the actions of SALKOFF and EBERT, and DOES 1-10, GUZMAN suffered severe pain and suffering and ultimately died from her injuries and lost any potential earning capacity. SALKOFF and EBERT and DOES 1-10 had no legal justification for using said force, including deadly force, against GUZMAN, while carrying out their official duties.

90. As a direct and proximate result of the SALKOFF and EBERT's conduct as alleged above, GUZMAN died and has left her daughter, CAMARILLO, to suffer extreme and severe mental anguish and pain. CAMARILLO has been deprived of the life-long love, companionship, comfort, non-economic support, society, care, and sustenance of GUZMAN, and will continue to be so deprived of her natural life. CAMARILLO and Co-Special Administrators are also claiming funeral and burial expenses.

91. Defendant CNLV, by and through NLVPD, is vicariously liable for the wrongful acts of SALKOFF and EBERT and DOES 1-10 because they were acting under color of law and within the course and scope of their employment as police officers for NLVPD.

92. The conduct of SALKOFF and EBERT were malicious, wanton, oppressive, and accomplished with a conscious disregard for the rights of Plaintiffs and GUZMAN, entitling Plaintiffs to an award of exemplary and punitive damages against SALKOFF and EBERT.

93. Plaintiffs seek all permissible wrongful death damages under Nev. Rev. Stat. §41.085, including, but not limited to, damages for their grief, sorrow, loss of probable non-economic support, companionship, society, comfort and consortium, and damages for pain, suffering of GUZMAN, and any penalties, including, but not limited to, exemplary and punitive damages.

94. Plaintiffs also seek statutory attorney fees and costs under this claim.

V.

### **THIRD CLAIM FOR RELIEF**

#### **NEGLIGENCE – WRONGFUL DEATH (Nevada State Law Claim) (SPECIAL ADMINISTRATORS v. ALL DEFENDANTS)**

95. Plaintiffs repeat, reallege, and incorporates herein by this reference, each and every allegation above as though fully set forth herein.

1           96.     The actions and inactions of the Defendants were negligent and reckless, as described  
2 below:

3                 a. The failure to properly code the dispatch call as 433 (Stolen property), rather than a  
4 413A (Person with a knife) based on the information from the 911 call.

5                 b. The failure to dispatch an adequate number of officers to respond to the call in  
6 violation of NLVPD policy and procedure;

7                 c. The failure to preplan and coordinate their approach to the call, given the  
8 circumstances;

9                 d. The failure to move Neil to safety and to aggravate the situation by talking to Neil  
10 where GUZMAN could see them;

11                e. The failure of SALKOFF and EBERT to utilize supporting officers who were already  
12 at the scene to deal with a person with mental illness, contrary to CNLV's policies and procedures;

13                f. The failure to properly and adequately assess the need to use deadly force against  
14 GUZMAN;

15                g. The failure of SALKOFF and EBERT to communicate with each other and DOES 1  
16 and 2;

17                h. The failure of SALKOFF and EBERT to develop a rapport with GUZMAN or even  
18 show any concern for her while she was inside the house;

19                i. The negligent tactics with GUZMAN, including the use of excessive force in shooting  
20 of GUZMAN and pre-shooting negligence and the failure to allow GUZMAN time to comply with  
21 their commands.

22                j. The failure to de-escalate the situation to prevent OIS;

23                k. The failure to use less intrusive means available;

24                l. The failure to use special caution when arrestee shows signs of mental instability;

25                m. The failure to provide adequate verbal warnings and commands and not providing  
26 GUZMAN an opportunity to comply.

27                n. The failure to provide warnings before deadly force was used;

28                o. The negligent use of deadly force against GUZMAN;



1 p. The negligent failures to employ tactics;

2 q. The failure to provide prompt medical care to GUZMAN;

3 r. The failure to properly train and supervise employees, including SALKOFF and  
4 EBERT and DOES 1-10;

5 s. The failure to ensure that adequate numbers of employees with appropriate education  
6 and training were available to meet the needs of and protect the rights of GUZMAN;

7 t. The negligent handling of report writing, evidence and witnesses; For example, the  
8 time-line in the reports is internally inconsistent and metaphysically impossible.

9 u. The failure to investigate into the conduct of SALKOFF and EBERT and DOES 1-10  
10 and the events relating to the shooting of GUZMAN and/or failure of NLVPD to conduct a prompt  
11 and thorough investigation into the actions/inactions of SALKOFF and EBERT and DOES 1-10;

12 v. The failure to do anything or take any action with respect to the shooting of  
13 GUZMAN, resulting in de facto ratification;

14 w. The failure to follow proper protocol in investigating this OIS and conducting  
15 thorough, unbiased interviews;

16 x. Violating NLVPD's policy regarding the use of excessive force specifically that  
17 applies to individuals suffering from mental crises.

18 y. Violating NLVPD's policy regarding the use of deadly force;

19 97. As a direct and proximate result of the Defendants' conduct as alleged above, and  
20 other undiscovered negligent conduct, GUZMAN was caused to suffer severe pain and suffering and  
21 ultimately died and lost earning capacity.

22 98. As a direct and proximate result of Defendants' conduct as alleged above, Plaintiffs  
23 suffered extreme and severe mental anguish and pain and have been injured in mind and body.  
24 CAMARILLO have been deprived of the life-long love, companionship, comfort, support, society,  
25 care, and sustenance of GUZMAN and will continue to be so deprived for the remainder of her  
26 natural life.

27 99. The CO-SPECIAL ADMINISTRATORS of DECEDENT's estate are also claiming,  
28 *inter alia*, funeral, and burial expenses.

100. NLVPD is vicariously liable for the wrongful acts of SALKOFF and EBERT and DOES 1-20 because they acted under the color of law and within the course and scope of their employment as police officers for the NLVPD.

101. Upon information and belief, the negligent acts of SALKOFF and EBERT, and DOES 1-20, which resulted in bodily harm, including death to GUZMAN were vicariously condoned by NLVPD.

102. The individual Plaintiffs seek all permissible damages under Nev. Rev. Stat. §41.085, including, but not limited to, damages for their grief, sorrow, loss of probable support, companionship, society, comfort and consortium, and damages for pain, suffering of the GUZMAN, any penalties, including, but not limited to, exemplary and punitive damages.

103. CAMARILLO also seek statutory attorney fees and costs under this claim.

## **VI.**

### **FOURTH CLAIM FOR RELIEF AMERICANS WITH DISABILITIES ACT- 42 USC. § 12131 And REHABILITATION ACT 29 USC. § 794 (SPECIAL ADMINISTRATORS v. CNLV)**

104. Plaintiffs repeat, reallege, and incorporates herein by this reference, each and every allegation above as though fully set forth herein.

105. Upon information and belief, CNLV by and through NLVPD, receives federal funding.

106. Upon information and belief, GUZMAN suffered from a mental disability.

107. Upon information and belief, CNLV by and through NLVPD, knew or should have known that GUZMAN suffered from mental disability based on her behavior.

108. CNLV by and through NLVPD, had an obligation under the Americans with Disabilities Act and the Rehabilitation Act (ADA) to accomodate GUZMAN's disability when attempting to effectuate her deten

1           109. Upon information and belief, CNLV by and through NLVPD, did not modify their  
2 tactics to account for GUZMAN's disability and in doing so both failed to reasonably accommodate  
3 her disability and discriminated against her based on her disability.

4           110. Upon information and belief, CNLV by and through NLVPD, does not instruct their  
5 officers to modify their tactics to effectuate arrest that reasonably accomodates disabilities when  
6 dealing with individuals with mental disabilities and by failing to do so discriminated against  
7 GUZMAN based on her disability.

8           111. The ADA was enacted "to provide a clear and comprehensive national mandate for  
9 the elimination of discrimination against individuals with disabilities" and "to provide clear, strong,  
10 consistent, enforceable standards addressing discrimination against individuals with disabilities." 42  
11 U.S.C. § 12101(b)(1) & (2).

12           112. Title II of the ADA provides: No qualified individual with a disability shall, by reason  
13 of such disability, be excluded from participation in or be denied the benefits of the services,  
14 programs, or activities of a public entity, or be subjected to discrimination by any such entity. *Id.* §  
15 12132. Discrimination includes a failure to reasonably accommodate a person's disability. To be a  
16 qualified individual with a disability, a person must suffer from a physical or mental impairment that  
17 substantially limits that person's ability to perform a major life activity — an activity that the  
18 average person in the general population can perform.

19           113. Title II of the ADA includes an affirmative obligation that public entities must make  
20 accommodations for people with disabilities.

21           114. Title II of the ADA mandates a public entity may be liable for damages under Title II  
22 of the ADA if it intentionally or with deliberate indifference fails to provide a reasonable  
23 accommodation to a disabled person. The failure to provide reasonable accommodation constitutes  
24 discrimination against the disabled person. A public entity may not disregard the plight and distress  
25 of a disabled person by failing to accommodate his or her needs.

1           115. Title II of the ADA mandates that once an entity is on notice of the need for  
2 accommodation, it is required to undertake a fact-specific investigation to determine what constitutes  
3 a reasonable accommodation.

4           116. Title II of the ADA applies to CNLV by and through NLVPD, because it is a public  
5 entity.

6           117. Title II of the ADA applies to police departments.

7           118. Title II of the ADA requires CNLV by and through NLVPD, to train its officers in  
8 how to deal with physically and mentally disabled individuals.  
9

10           119. Title II of the ADA mandates that government agencies, including police officers,  
11 must take a disabled person's disability into account by making reasonable modifications of policies  
12 and practices where needed to avoid discrimination. 42 U.S.C. Section 12132, 28 C.F.R. Section  
13 35.130(b)(7).

14           120. GUZMAN's form of mental illness is a recognized impairment for purposes of the  
15 ADA.  
16

17           121. GUZMAN was disabled under the ADA because her mental illness substantially  
18 limited her ability to communicate, to interact with others, and to care for himself.

19           122. CNLV by and through NLVPD, knew or should have known GUZMAN was  
20 experiencing a severe mental health crisis. These Defendants should have known how to  
21 accommodate her mental illness by employing de-escalation strategies with the intent of achieving a  
22 safe and nonviolent self-surrender. Yet despite this knowledge, and the national mandate to  
23 accommodate the disabled, these Defendants chose to not to accommodate GUZMAN impairment  
24 and chose to apply tactics that made a safe and nonviolent self-surrender impossible.  
25

26           123. CNLV by and through NLVPD, utilized techniques nationally understood to  
27 exacerbate and intensify stress and apprehension in the mentally ill. Such practices have long been  
28 rejected by police departments when interacting with persons suffering mental impairment. Such

1 practices render it impossible for mentally ill persons to understand and/or to comply with directives  
2 and commands and are guaranteed to make a safe and peaceful self-surrender impossible.

3 124. CNLV by and through NLVPD, could have reasonably accommodated GUZMAN by  
4 preplanning and coordinating with each other on how to approach, using nonlethal beanbag  
5 measures, and using the passage of time to defuse the situation peacefully rather than encouraging an  
6 deadly confrontation.

7 125. CNLV by and through NLVPD, had the time, safety and opportunity to assess the  
8 situation and administer a strategy to appropriately accommodate GUZMAN because she was alone  
9 inside the house, she maintained significant proximity from Defendants, and Defendants were  
10 positioned for safe retreat.  
11

12 126. At all times, CNLV by and through NLVPD, could have accommodated GUZMAN  
13 by not aggravating the situation when they were hanging out in front of the house and chatting with  
14 GUZMAN's roommate. Even when an emotionally disturbed individual is acting out and inviting  
15 officers to use force to subdue him, the government interest in using such force is diminished by the  
16 fact that the officers are confronted, not with a person who has committed a serious crime against  
17 others, but with a mentally ill person who needs and requires accommodation for his disability.  
18

19 127. At all times, CNLV by and through NLVPD, knew or should have known that  
20 GUZMAN had a knife and that she was mentally distressed and because of her impairment, they  
21 were required to exert greater effort and caution to take control of the situation through less intrusive  
22 means.  
23

24 128. By failing to accommodate GUZMAN's mental health disability, Defendants acted  
25 with discriminatory intent and deliberate indifference to her protected rights.

26 129. The conduct alleged herein was done in reckless disregard of GUZMAN's protected  
27 rights.  
28



- 1 E. For punitive damages against SALKOFF and EBERT in an amount to be  
2 proven in trial;  
3 F. For interest;  
4 G. For reasonable costs of this action, court costs, and attorneys' fees; and  
5 H. For such other and further relief as the Court may deem just, proper, and  
6 appropriate.  
7

8 DATED: May 15, 2025

PETER GOLDSTEIN LAW CORP

9  
10  
11 By: /s/ Peter Goldstein  
PETER GOLDSTEIN, ESQ.

12 *Attorney for Plaintiffs*  
13 *ANGELINA CAMARILLO, Individually*  
14 *and as Co-Special Administrator with ROLLY*  
15 *ENRIQUEZ of estate of FELICIA GUZMAN*  
16  
17

**DEMAND FOR JURY TRIAL**

18 Plaintiffs, by and through their attorneys of record, hereby demand a jury trial of all of the  
19 issues in the above matter.  
20

21 DATED: May 15, 2025

22 PETER GOLDSTEIN LAW CORP

23  
24 By: /s/ Peter Goldstein  
PETER GOLDSTEIN, ESQ.

25 *Attorney for Plaintiffs*  
26 *ANGELINA CAMARILLO, Individually*  
27 *and as Co-Special Administrator with ROLLY*  
28 *ENRIQUEZ of estate of FELICIA GUZMAN*

# EXHIBIT A



## CERTIFICATION OF VITAL RECORD

DEPARTMENT OF HEALTH AND HUMAN SERVICES  
DIVISION OF PUBLIC AND BEHAVIORAL HEALTH  
VITAL STATISTICS

## CERTIFICATE OF DEATH

CASE FILE NO. 4350151

2023011612

STATE FILE NUMBER

TYPE OR  
PRINT IN  
PERMANENT  
BLACK INK

DECEDENT

IF DEATH  
OCCURRED IN  
INSTITUTION SEE  
HANDBOOK  
REGARDING  
COMPLETION OF  
RESIDENCE  
ITEMS

PARENTS

DISPOSITION

TRADE CALL

CERTIFIER

REGISTRAR

CAUSE OF  
DEATHCONDITIONS IF  
ANY WHICH  
GAVE RISE TO  
IMMEDIATE  
CAUSE  
STATING THE  
UNDERLYING  
CAUSE LAST

1a. DECEASED-NAME (FIRST,MIDDLE,LAST,SUFFIX) <b>Felicia Rena GUZMAN</b>		2. DATE OF DEATH (Mo/Day/Year) <b>May 16, 2023</b>		3a. COUNTY OF DEATH <b>Clark</b>	
3b. CITY, TOWN, OR LOCATION OF DEATH <b>Las Vegas</b>		3c. HOSPITAL OR OTHER INSTITUTION -Name(if not either, give street number) <b>University Medical Center</b>		3e. If Hosp. or Inst. indicate DOA, OP/Emer. Rm. Inpatient(Specify) <b>Operating Room</b>	
4. SEX <b>Female</b>		5. RACE (Specify) <b>White</b>		6. Hispanic Origin? Specify <b>Yes - Mexican</b>	
7a. AGE-Last birthday (Years) <b>43</b>		7b. UNDER 1 YEAR <b>MOS DAYS</b>		7c. UNDER 1 DAY <b>HOURS MINS</b>	
8. DATE OF BIRTH (Mo/Day/Yr) <b>February 15, 1980</b>		9a. STATE OF BIRTH (If not US/CA, name country) <b>California</b>		9b. CITIZEN OF WHAT COUNTRY <b>United States</b>	
10. EDUCATION <b>14</b>		11. MARITAL STATUS (Specify) <b>Never Married</b>		12. SURVIVING SPOUSE'S NAME (Last name prior to first marriage)	
13. SOCIAL SECURITY NUMBER <b>[REDACTED]</b>		14a. USUAL OCCUPATION (Give Kind of Work Done During Most of) <b>OFFICE CLERK</b>		14b. KIND OF BUSINESS OR INDUSTRY <b>MEDICAL</b>	
15a. RESIDENCE - STATE <b>Nevada</b>		15b. COUNTY <b>Clark</b>		15c. CITY, TOWN OR LOCATION <b>Las Vegas</b>	
15d. STREET AND NUMBER <b>555 Green Gables Avenue</b>		15e. INSIDE CITY LIMITS (Specify Yes or No) <b>Yes</b>		Ever in US Armed Forces? <b>No</b>	
16. FATHER/PARENT - NAME (First Middle Last Suffix) <b>Ricardo J GUZMAN</b>		17. MOTHER/PARENT - NAME (First Middle Last Suffix) <b>Consuelo Linda RENTERIA</b>			
18a. INFORMANT- NAME (Type or Print) <b>Consuelo Linda GUZMAN</b>		18b. MAILING ADDRESS (Street or R.F.D. No, City or Town, State, Zip) <b>3536 Faberge Way Sacramento, California 95826</b>			
19a. BURIAL, CREMATION, REMOVAL, OTHER (Specify) <b>Cremation</b>		19b. CEMETERY OR CREMATORY - NAME <b>Paradise Valley Crematory</b>		19c. LOCATION City or Town State <b>Las Vegas Nevada 89119</b>	
20a. FUNERAL DIRECTOR - SIGNATURE (Or Person Acting as Such) <b>BILLY C VALLIE Jr</b>		20b. FUNERAL DIRECTOR LICENSE NUMBER <b>FD918</b>		20c. NAME AND ADDRESS OF FACILITY <b>Davis Funeral Home and Memorial Park 6200 S Eastern Las Vegas NV 89119</b>	
21a. To the best of my knowledge, death occurred at the time, date and place and due to the cause(s) stated. (Signature & Title) <b>STEPHANIE YAGI DO</b>					
21b. DATE SIGNED (Mo/Day/Yr) <b>May 26, 2023</b>		21c. HOUR OF DEATH <b>18:59</b>		21d. NAME OF ATTENDING PHYSICIAN IF OTHER THAN CERTIFIER (Type or Print)	
22a. On the basis of examination and/or investigation, in my opinion death occurred at the time, date and place and due to the cause(s) stated. (Signature & Title) <b>STEPHANIE YAGI DO</b>		22b. DATE SIGNED (Mo/Day/Yr) <b>May 26, 2023</b>		22c. HOUR OF DEATH <b>18:59</b>	
22d. PRONOUNCED DEAD (Mo/Day/Yr) <b>May 16, 2023</b>		22e. PRONOUNCED DEAD AT (Hour) <b>18:59</b>		23a. NAME AND ADDRESS OF CERTIFIER (PHYSICIAN, ATTENDING PHYSICIAN, MEDICAL EXAMINER, OR CORONER) (Type or Print) <b>Stephanie Yagi DO 1704 Pinto Lane Las Vegas, NV 89106</b>	
23b. LICENSE NUMBER <b>DO3172</b>		24a. REGISTRAR (Signature) <b>NANCY BARRY</b>			
24b. DATE RECEIVED BY REGISTRAR (Mo/Day/Yr) <b>May 26, 2023</b>		24c. DEATH DUE TO COMMUNICABLE DISEASE <b>YES <input type="checkbox"/> NO <input checked="" type="checkbox"/></b>			
25. IMMEDIATE CAUSE (ENTER ONLY ONE CAUSE PER LINE FOR (a), (b), AND (c).) PART I (a) <b>Multiple Gunshot Wounds</b> DUE TO, OR AS A CONSEQUENCE OF: (b) <b></b> DUE TO, OR AS A CONSEQUENCE OF: (c) <b></b> DUE TO, OR AS A CONSEQUENCE OF: (d) <b></b>					
PART II OTHER SIGNIFICANT CONDITIONS-Conditions contributing to death but not resulting in the underlying cause given in Part 1.					
26. AUTOPSY (Specify Yes or No) <b>Yes</b>		27. WAS CASE REFERRED TO CORONER (Specify Yes or No) <b>Yes</b>			
28a. ACC., SUICIDE, HOM., UNDET. OR PENDING INVEST. (Specify) <b>Homicide</b>		28b. DATE OF INJURY (Mo/Day/Yr) <b>May 16, 2023</b>		28c. HOUR OF INJURY <b>1633</b>	
28d. DESCRIBE HOW INJURY OCCURRED <b>Shot By Other(s)</b>		28e. INJURY AT WORK (Specify Yes or No) <b>No</b>			
28f. PLACE OF INJURY- At home, farm, street, factory, office building, etc. (Specify) <b>Outdoors/Non-Public</b>		28g. LOCATION <b>1414 Basin Brook Drive</b>			
STREET OR R.F.D. No. <b></b>		CITY OR TOWN <b>North Las Vegas</b>		STATE <b>Nevada</b>	

"CERTIFIED TO BE A TRUE AND CORRECT COPY OF THE DOCUMENT ON FILE WITH THE REGISTRAR OF VITAL STATISTICS, STATE OF NEVADA." This copy was issued by the Southern Nevada Health District from State certified documents authorized by the State Board of Health pursuant to NRS 440.175.

Registrar of Vital Statistics SIGNATURE AUTHENTICATED

By: *Susan Zannis*

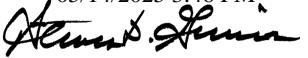
DATE ISSUED: 6/1/2023

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# EXHIBIT B



  
CLERK OF THE COURT

1 **OASA**

2 Peter Goldstein, Esq., (SBN 6992)

3 **PETER GOLDSTEIN LAW CORP**

4 10161 Park Run Drive, Suite 150

5 Las Vegas Nevada, 89145

6 Telephone: 702-474-6400

7 Facsimile: 888-400-8799

8 peter@petergoldsteinlaw.com

9 *Attorney for Petitioner,*

10 *ANGELINA CAMARILLO and ROLLY ENRIQUEZ*

11 **JUDICIAL DISTRICT COURT**

12 **CLARK COUNTY, NEVADA**

13 In the Matter of the Estate of  
14 FELICIA RENA GUZMAN

15 Deceased,

P-24-121635-E Consolidated with

Case No.: P-25-125120-E

Dept. 26

**PROPOSED ORDER**

16 **ORDER APPOINTING SPECIAL ADMINISTRATOR AND FOR ISSUANCE OF**  
17 **SPECIAL LETTERS OF ADMINISTRATION**

18 Upon submission of a verified *ex parte* petition for appointment of a special administrator  
19 and for issuance of special letters of administration representing as follows:

20 Felicia Rena Guzman ("Decedent") died intestate on May 16, 2023 in Clark County,  
21 Nevada.

- 22 1. Decedent was a resident of Clark County, Nevada when she died.
- 23 2. Petitioners have never been convicted of a felony.

24 **NOW THEREFORE IT IS HEREBY ORDERED** that Petitioners Angelina Camarillo  
25 and Rolly Enriquez are appointed as Special Co-Administrators of the Estate of Felicia Rena  
26 Guzman and that Special Letters of Administration be issued, without bond, to Petitioners  
27 Angelina Camarillo upon taking the oath of office, for the purpose of administering the estate in  
28

1 accordance with Nevada Revised Statutes Chapter §140.040.

2 **IT IS FURTHER ORDERED** that all moneys received by this Estate will be placed in  
3 the attorney's trust account until further ordered by the Court.

4 **IT IS FURTHER ORDERED** that the settlement of the Decedent's lawsuit is subject to  
5 this Court's approval.

6  
7 Dated this \_\_\_\_ day of \_\_\_\_, 2025.

Dated this 14th day of May, 2025



C5F 4B4 82D9 7C41  
Gloria Sturman  
District Court Judge

District Court Judge

11  
12 Respectfully submitted,

13 By:   
14 PETER GOLDSTEIN, ESQ. [SBN 6992]  
15 10161 Park Run Drive, Suite 150  
16 Las Vegas, Nevada 89145  
17 *Attorney for Petitioners*  
18 *Angelina Camarillo and Rolly Enriquez*  
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